

Minutes for Rule 21 Working Group Meeting 57

August 31, 2004

Southern California Edison

There were 32 Working Group members in attendance.

Scott Tomashefsky, Chair

Pat	Aldridge	SCE	Art	McAuley	PG&E
Manuel	Alvarez	SCE	Dave	Michel	CEC
Tom	Blair	City of San Diego	Steven	Ng	PG&E
Werner	Blumer	CPUC/ED	Bob	Panora	Tecogen
Petrina	Burnham	SDG&E	Edan	Prabhu	Reflective Energies
Bill	Cook	SDG&E	Dave	Redding	Riverside Pub. Util.
George	Couts	SCE	Laura	Rudison	SCE
Tom	Dossey	SCE	Dylan	Savidge	PG&E
Michael	Edds	DG Energy Solutions	Nora	Sheriff	CAC/EPUC
Lynn	Ferry	SCE	Joe	Simpson	Joe Simpson
Jeff	Goh	PG&E	Chuck	Solt	Lindh & Assoc
Ed	Grebel	SCE	Gerome	Torribio	SCE
Mike	Iammarino	SDG&E	Dan	Tunncliff	SCE
Karl	Iliev	SDG&E	Mohammad	Vaziri	PG&E
Scott	Lacy	SCE	Chuck	Whitaker	Endecon Engrg
Mike	Mazur	3 Phases Ergy Serv.	Kim	Whitsel	PG&E

Utility Status Reports and Timing

Utilities have been using the new reporting format. The CEC indicated that the new format meets their needs. It was decided that PG&E would only report quarterly, while the other 2 utilities will continue reporting monthly.

Advice Letter Progress and Status

SDG&E and SCE have filed Advice Letters with the PUC for the revised Rule 21. PG&E submitted their document for review and will file formally shortly. There was a conference call with all three utilities and Werner Blumer to discuss some changes. Some of the changes were suggested by Werner and some by the utilities. There were some non-technical changes that were primarily editorial. There were also several technical changes. Those were reviewed by the technical group (see resolution below).

Application Form

The revised Application Form is complete, and the changes in the Rule 21 will not necessitate changes in the Application. The utilities will wait for completion of Rule 21 before they submit the Application Form in Advice Letters in Advice Letters to the PUC.

IEEE 1547 Update

The IEEE held a series of meetings in Las Vegas to work on the follow-on components of IEEE 1547. 1547.1, the testing specification, is nearly complete and will be circulated for vote around the first of October

DG Monitoring Program “Final” Report

Phase I of the DG Monitoring program under Focus II is now complete. The report is available for review on the web site at www.dgmonitors.com. The CEC is seeking comments from the public. The utilities indicated a desire to comment. Edan Prabhu asked for comments by September 15th if possible. The utilities indicated they would bring their comments to the next Rule 21 meeting for discussion.

Rule 21 Action Item Matrix

The matrix has been updated and will continue to be addressed as time permits.

Quarterly Reporting Format

CPUC Resolution E-3831 requires the utilities to report quarterly on DG activity. PG&E had submitted a format that the CPUC liked. The utilities will submit the format to the PUC by September 8 and the first report will be due October 6.

Within the DG OIR process, Scott will raise the question of whether the report is really needed. It appears that the present reporting supplies all of the information needed.

Next few Meetings:

The CPUC issued a Scoping Document covering interconnection issues under the DG OIR (R.04-03-017). This document assigned certain tasks to the Rule 21 Working Group. The group is to report on these interconnection issues to the CPUC by Nov. 1, 2004. In order to accommodate this requirement, the Working Group has scheduled 4 meetings in September and October. They will be:

- Sept. 15 Wed. SDG&E in San Diego
- 29 Wed. CEC Headquarters in Sacramento
- Oct. 13 Wed. SCE in Fontana
- 27 Wed. PG&E in Oakland

DG OIR Issue Review

The Scoping Document assigns 4 subjects to the Rule 21 Working Group. The discussion in Meeting 57 covered these 4 issues as well as the process that will be used in addressing the issues.

Process – The Rule 21 Working Group report that is developed in connection with this effort is not likely to be a group consensus report. It will attempt to provide a discussion of the various positions of the group and frame the decisions it believes should be considered by the Energy Commission.

All four issues will be addressed at each meeting with possible emphasis on one or two. A leader for each activity will be assigned and drafts or data will be put together and distributed before the following meeting.

Status reports will be provided, but no status reports for September 15 meeting. The first status report will be completed for the Sept 29, and follow on reports for the October meetings.

Metering Issues – Nora Sheriff will summarize all positions and send the draft to Scott by 13th.

- Is generator metering needed, or should metering be limited to point of common coupling?
- If generator metering is needed, must it be Utility grade?
- Who can own it?

Utilities feel utility grade metering is required for rate administration issues including allocation of non-bypassable charges. The DG community feels that, in many cases, generator metering is not needed at all, and where it is, it does not need to be utility grade. Their concerns are cost and confidentiality.

Dispute Resolution Process – PG&E to summarize. It was suggested that other stakeholder share their experiences with resolving interconnection-related disputes.

The group would like to develop a list and general description of disputes have come up under rule 21 since the new rule went into effect. So far, there has only been one formal dispute (RealEnergy vs. PG&E)

The summary will also include a comparison of the Rule 21 and the Massachusetts Dispute Processes. The Massachusetts Dispute Process may not have been used so far.

Net Metering for Systems with “Combined” Technologies – A White paper will be prepared by Torribio/Iammarino by Sept 13.

- Systems with both net metering and non-net metering generation.
 - How do you keep non-net metering generation power from flowing into the utility system while allowing net-metered power to flow?
- Systems with two types of qualifying generation that have different rates.
 - How do utilities differentiate between different qualifying sources?

Interconnection Fees/Costs

Are the \$1400 fees sufficient to cover expenses or perhaps excessive?

Jerry Torribio will Draft a modified form for gathering data on costs associated with reviewing, approving and inspecting Rule 21 interconnections. He will also comment on probable data availability

Utilities feel that too many non-certified units drive the costs up.

Utilities feel larger projects cost more.

Utilities are concerned that some applications and some installations are poorly done, resulting in excessive time spent by utility personnel in holding the developers hand to correct errors.

Cost data is needed.

What are the costs for the actual interconnection facility?

Scott will cover the hardware cost issue.

Edan will draft a discussion of charging additional fees for added utility time involved with poor quality applications and poor quality installations.

Technical Group

Advice Letter Technical Issues

- Reviewed and addressed technical comments generated by CPUC/IOU.

Review Technical Action Items

- No Changes

T105 Inadvertent Export

- Whitaker to create definition in Supplemental Review based on Cook's last version.

T107 Alternate Relay Test –

- Whitaker to find last version with final questions/issues and forward to Moh

T121 Line Section Definition

- Moh Vaziri described a problem they have encountered with exporting DG on a shared secondary in a location where the primary voltage is near the upper limit of ANSI Range a (126V) and the aggregate export (which exceeds the aggregate load on the secondary) causes the secondary to rise to a level exceeding Range A and Range B, but below the trip threshold of the DG. These levels are potentially problematic to the neighboring customers and they would like a way to have this situation caught in the initial review process.
- One suggestion was to change the definition of line section (the extended version in the Supplemental Review Guideline) to include the fuse on a shared distribution transformer.
- Since this is a problem primarily related to exporting systems, another option is to add language to the export screen.
- Moh Vaziri agreed to provide suggested language.

T110 Networks

- PG&E will provide their write-up on interconnection to spot networks along with their revised white paper. Moh Vaziri provided a description of the requirements and the relevant issues driving them.
 - Currently limited to Spot Networks
 - Install double set point reverse power relay on network protector (instantaneous hi set, delayed lower level)

- Install monitoring of network protector status and send shut down signal to DR whenever 50% or more of the protectors are open.
- Defining minimum import levels is still a tricky proposition. Low network load levels (even though the network is a net load and even without DG) can result in unneeded protector operations just due to small differences in impedance between network transformers.
- Discussed response to faults on adjacent feeders and other potential problem areas.
- Unanswered question: Is downtown LA a grid network?

C101 Export Screen

- Update from Iliev/Vaziri on direction for secondary export screen
- Review replacing the controversial term “incidental” with “negligible”, which would likely be inserted as a simple descriptive adjective without further definition.
- Discuss options for evaluating a threshold power/current/% of line capacity—200kW, 10 Amps and 10% of the smallest conductor between the customer and the substation have been suggested. According to Moh, Jim Skeen is still willing to work on this analysis.

Respectfully Submitted:

Chuck Solt
Chuck Whitaker

Approved:

Scott Tomashefsky